



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

UNITED STATES OF AMERICA

V.

LAVORIS COLEMAN,

Defendant.

Criminal No. 3:25-*mj* 68

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Daniel B. Woods, being first duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent ("SA") with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), and as such, I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7); that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2416 (1). I investigate violations of the laws of the United States as delineated in Title 28 of the Federal Code of Regulations. I have been a Special Agent with the ATF since June of 2018.

2. My duties as a Special Agent include the investigation of criminal violations of Federal Firearms and Narcotics laws. I have been involved in numerous investigations related to prohibited persons possessing firearms, persons trafficking firearms, and persons distributing controlled substances. I have been involved in the execution of search warrants and arrests resulting from prohibited person possessing firearms.

persons trafficking firearms, and the distribution of controlled substances and the concealing of drug-related assets.

3. I make this affidavit in support of a criminal complaint, charging Lavioris COLEMAN (hereinafter "COLEMAN") with possession of a firearm by a convicted felon, in violation of 18 U.S.C. § 922(g)(1).

4. This affidavit is being submitted for the limited purpose to show that there is sufficient probable cause for the requested arrest warrant and does not set forth all my knowledge about this investigation. Instead, I have set forth only facts that I believe are sufficient to charge COLEMAN with a violation of the Subject Offense.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that COLEMAN (black male, date of birth X/XX/1991, social security number XXX-XX-3408, currently in custody at the Northern Neck Regional Jail) has committed violations of Title 18, United States Code, Section 922(g)(1), possession of a firearm by a convicted felon.

RELEVANT STATUTORY PROVISIONS

6. 18 U.S.C. § 922(g)(1)—Possession of a Firearm by a Convicted Felon

PROBABLE CAUSE

7. On November 24, 2023, at approximately 2126 hours, RPD officers Richards and Barnes-Christian responded to a breaking and entering call for service in the Hillside Court housing complex area, which is a known high crime area involving firearm and drug activity. Officers arrived at 1517 Harwood Street and learned from the Richmond Redevelopment and

Housing Authority (RRHA) security officers they heard gunfire in the area. The RRHA security officers stated to the RPD officers they saw a male, later identified as COLEMAN, wearing a white t-shirt knocking on a resident door at 1517 Harwood Street with a firearm in his hand. COLEMAN had a firearm with a green laser in his hand. The officers also stated they heard the voice of a woman inside the residence telling COLEMAN to leave. COLEMAN threatened that if he were not let in, he would “shoot this sh** up.”

8. The officers attempted to make contact with the COLEMAN, but he fled on foot towards Lone Street. As COLEMAN ran towards Lone Street, the officers heard multiple shots fired.

9. Officer Barnes-Christian was first in the pursuit of COLEMAN. He saw the defendant standing at a trashcan placing what Officer Barnes-Christian concluded was a firearm into the trashcan. The Officers challenged COLEMAN, then a short foot pursuit ensued. COLEMAN was taken into custody shortly thereafter.

10. Officer Barnes-Christian immediately returned to the trash bin COLEMAN was observed placing a firearm in and recovered a Glock 19X firearm (S/N: BHKY729) with a mounted light. A fifty (50) round drum magazine was also recovered, and Officer Richards recovered three (3) 9mm cartridge casings in the area COLEMAN was located when officers heard shot being fired. A laboratory report later determined that those casings were fired from the same firearm that the officers say COLEMAN possessed.

11. COLMAN was confirmed to be a convicted felon and acknowledged to being in possession of a firearm in a post *Miranda* interview. Also, a firearms expert who is a special agent with the ATF has confirmed that the firearm noted in paragraph 10, above, has travelled in and affected interstate commerce as it was manufactured outside of the Commonwealth of Virginia.

CONCLUSION

12. Based on the foregoing facts, I respectfully submit there is probable cause to charge COLEMAN with Possession of a Firearm by a Convicted Felon, in violation of Title 18, United States Code, Section 922 (g)(1).

Respectfully submitted,



Daniel B. Woods
Special Agent
Bureau of Alcohol, Tobacco, Firearms, and
Explosives

Subscribed and sworn to before me
on the 20th day of June 2025.



Mark R. Colombell
UNITED STATES MAGISTRATE JUDGE